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13 *Attorneys for Defendants Koninklijke Philips N.V., and
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15 **UNITED STATES DISTRICT COURT**
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

17 In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

18 This Document Relates to:

**KONINKLIJKE PHILIPS N.V. AND
PHILIPS ELECTRONICS NORTH
AMERICA CORPORATION'S
SUPPLEMENTAL INITIAL
DISCLOSURES**

21 ALL ACTIONS

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1 Pursuant to Federal Rules of Civil Procedure 26(a)(1) and 26(e)(1), Defendants Koninklijke
 2 Philips N.V. (“KPNV”) and Philips Electronics North America Corporation (“PENAC”)
 3 (collectively the “Philips Defendants”) hereby supplement their initial disclosures.

4 This supplement of the Philips Defendants’ Initial Disclosures are made without prejudice to
 5 the Philips Defendants’ right to amend, revise, or supplement their disclosures further at a later date.
 6 By making this supplement, the Philips Defendants do not represent that it is identifying every
 7 witness that may have discoverable information to the issues in this lawsuit, or on which the Philips
 8 Defendants may rely on in support of its defenses.

9 Further, this supplement is subject to all appropriate objections that would require the
 10 exclusion of any information contained herein if introduced as evidence at court. All such objections
 11 are reserved and may be interposed at the time of trial. No admissions of any nature are implied or
 12 should be inferred.

13 The Philips Defendants reserves any applicable privileges that may apply to this disclosure
 14 and any further supplemental disclosures or other pre-trial discovery, including attorney-client, work
 15 product, and any other applicable privilege.

16 The Philips Defendants reserve the right to continue their investigation and discovery of
 17 facts, witnesses, and documents that may reveal additional information about the issues in this
 18 matter. Defendants reserve the right at the time of trial to produce, refer to, and offer into evidence
 19 any additional documents, facts, and evidence from any sources and testimony from any witness
 20 which may be ascertained through its continuing discovery and trial preparation, notwithstanding the
 21 reference to information in this supplement.

22 SUPPLEMENTAL INITIAL DISCLOSURES

23 I. Persons With Knowledge of Discoverable Information (Rule 26(a)(1)(A)(i))

24 Set forth below are the names of individuals likely to have discoverable information that the
 25 Philips Defendants may use to support their defenses. The Philips Defendants reserve the right to
 26 identify additional witnesses as discovery progresses. The Philips Defendants believe that these
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1 individuals will likely have information concerning the subjects identified below as well as other
2 issues that may be developed during discovery.

- 3 • Frans Johannes Spaargaren
4 • Jim Smith
5 • Jan de Lombaerde
6 • Patrick Canavan

7 Mr. Spaargaren is likely to possess knowledge and information concerning the corporate
8 structure of the Cathode Ray Tube (“CRT”) business from 1995 through June 2001, the divestiture
9 of the CRT business to the independent joint venture LG.Philips Displays (“LPD”) in July 2001.
10 Mr. Smith is likely to possess knowledge and information concerning the market for, and sale of,
11 CRTs. Mr. de Lombaerde is likely to possess knowledge and information concerning Philips
12 Consumer Electronics’ purchase and use of cathode ray tubes in televisions and computer monitors.
13 Mr. Canavan is likely to possess knowledge and information concerning the market for, and sale of
14 CRTs by PENAC from 1995 through June 2001 and by LPD from June 2001 through 2006.

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16 DATED: September 26, 2013

BAKER BOTTS L.L.P.

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18 By: /s/Jon V. Swenson

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